

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF RHODE ISLAND**

IN RE:	Gerald R. Galleshaw	:	
	Debtor	:	
		:	
DAVID C. FRAIOLI and NEW		:	
ENGLAND AUTO CENTER, INC.		:	
Plaintiffs/Counterclaim Defendants	:	CASE NO:	15-11047
	:		
V.	:	CHAPTER	7
	:		
GERALD R. GALLESASHAW,		:	ADV. PRO. NO.: 15-01023
Defendant/ Counterclaim Plaintiff	:		

**PLAINTIFFS/COUNTERCLAIM DEFENDANTS, DAVID C. FRAIOLI AND NEW
ENGLAND AUTO CENTER, INC'S OBJECTION TO DEFENDANT/COUNTERCLAIM
PLAINTIFF, GERALD R. GALLESASHAW, APPLICATION TO CLERK FOR ENTRY OF
DEFAULT**

Plaintiffs/Counterclaim Defendants, David C. Fraioli (“Fraioli”) and New England Auto Center, Inc. (“NEAC”) (Fraioli and NEAC are at times collectively referred to as “Plaintiffs”) hereby objects to Defendant/Counterclaim Plaintiff, Gerald R. Galleshaw’s (“Galleshaw”) Application to Clerk for Motion for the Entry of Default. As grounds therefore, the Plaintiffs have filed their answer.

David C. Fraioli and
New England Auto Center, Inc.
By its Attorneys,

/s/ Ryanna T. Capalbo
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Dated: May 5, 2016

CERTIFICATION

I hereby certify that on the 5th day of May, 2016, I electronically filed a true and accurate copy of the within document to be sent via electronic means with the Clerk of the Bankruptcy Court for the District of Rhode Island using the CM/ECF System and via email to the following:

Todd Dion, Esq.
Law Office of Todd S. Dion
1599 Smith Street
North Providence, RI 02911

/s/ Ryanna T. Capalbo, Esq.
Ryanna T. Capalbo, Esq., #8314